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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

-----)	
IN RE: NATIONAL)	MDL No. 2804
PRESCRIPTION OPIATE)	
LITIGATION)	Case No.
-----)	1:17-MD-2804
)	
THIS DOCUMENT RELATES TO)	Hon. Dan A. Polster
ALL CASES)	
-----)	

HIGHLY CONFIDENTIAL
SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF
REX SWORDS

December 21, 2018

Chicago, Illinois

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<p style="text-align: right;">Page 342</p> <p>1 drug?</p> <p>2 A. National Drug Code.</p> <p>3 Q. National Drug Code identifying specific</p> <p>4 information about the controlled substance,</p> <p>5 correct?</p> <p>6 A. Well, it identifies specific information</p> <p>7 about the product.</p> <p>8 Q. The product. And in this case in the</p> <p>9 override form that we are looking at would be</p> <p>10 Schedule II or Schedule III, right?</p> <p>11 A. Well, the NDC refers to the manufacturer</p> <p>12 and the product. So, it would be whoever the</p> <p>13 product manufacturer in this example is for</p> <p>14 oxycodone APAP 525.</p> <p>15 Q. Right.</p> <p>16 A. I don't know who it is. That's who it</p> <p>17 would have been.</p> <p>18 Q. The "UPC Code" is?</p> <p>19 A. That's a little different. That's</p> <p>20 actually the bar code. Information on the bottle</p> <p>21 itself, not necessarily the NDC number as well.</p> <p>22 Q. And then the "PLN Number"?</p> <p>23 A. That's an internal number used for</p> <p>24 grouping particular categories together. I never</p>	<p style="text-align: right;">Page 344</p> <p>1 codes are?</p> <p>2 A. Well, Tasha's team could certainly tell</p> <p>3 you what the reason codes are.</p> <p>4 Q. Are they written somewhere?</p> <p>5 A. It's probably part of the system. So,</p> <p>6 they have a drop-down. They'd select a reason</p> <p>7 code. Whatever I select corresponds to a No. 2 is</p> <p>8 out of stock. No. 3 is whatever. Right.</p> <p>9 Q. So, if I go to the very far U -- just</p> <p>10 bear with me and let your eye go down that line all</p> <p>11 the way down to U. Was it U? Yes. U. All the</p> <p>12 way down the right-hand column.</p> <p>13 Do you see how it -- there is almost</p> <p>14 like a line with the explanations?</p> <p>15 A. Yes.</p> <p>16 Q. And they all end in, not all, but a lot</p> <p>17 of them, "Override approved. Your order was sent</p> <p>18 directly to your DC"?</p> <p>19 A. Yes.</p> <p>20 Q. Now, does that -- does U correlate with</p> <p>21 the "Request Reason Code"?</p> <p>22 A. Yes. I believe it does.</p> <p>23 Q. I could kind of match up if I went</p> <p>24 through here and matched them up, whatever is</p>
<p style="text-align: right;">Page 343</p> <p>1 use it. I don't know what actually -- it's got</p> <p>2 some function. I don't know what it is.</p> <p>3 Q. We can see in column H the actual drug</p> <p>4 name?</p> <p>5 A. Yes.</p> <p>6 Q. Whether it's a combination drug,</p> <p>7 whenever it is, is listed in column H; and we can</p> <p>8 see for those few entries are all oxycodone,</p> <p>9 correct?</p> <p>10 A. Correct.</p> <p>11 Q. And then the "Requested Quantity" is 3</p> <p>12 and the "Request Reason Code" is 2?</p> <p>13 A. Correct.</p> <p>14 Q. Tell me what the requested -- what's the</p> <p>15 quantity refer to?</p> <p>16 A. The number of units of stock units being</p> <p>17 requested.</p> <p>18 Q. All right. So, and that obviously</p> <p>19 correlates with the NDC code, correct?</p> <p>20 A. Correct.</p> <p>21 Q. And then the request reason code. Where</p> <p>22 can I -- what are the reason codes? That's a bad</p> <p>23 question.</p> <p>24 Where can I find out what the reason</p>	<p style="text-align: right;">Page 345</p> <p>1 entered maybe would have a drop-down menu so you</p> <p>2 would click and then it would populate in U?</p> <p>3 A. I don't know. That's possible, but I</p> <p>4 don't know for sure.</p> <p>5 Q. Very unlikely that whoever is from</p> <p>6 Pharmaceutical Integrity is typing in the same</p> <p>7 notes in U over and over and over again?</p> <p>8 A. Well, I mean, even if you just use the</p> <p>9 first two, you can kind of say that logic doesn't</p> <p>10 work, right, because the reason request is 2 and 2</p> <p>11 and you have got two different order statuses over</p> <p>12 here. So, they don't correspond.</p> <p>13 Q. How do you think U is populated?</p> <p>14 A. I think that's a text or free form that</p> <p>15 the individual under column S is entering.</p> <p>16 Q. All right. So, the information that's</p> <p>17 in both J under "Request Reason Code" and U is what</p> <p>18 would give Pharmaceutical Integrity information if</p> <p>19 you were looking back about why the override was</p> <p>20 approved or disapproved, correct?</p> <p>21 A. That's my understanding.</p> <p>22 Q. And this -- the information put into</p> <p>23 these has to be -- it's important, is it not?</p> <p>24 A. It certainly serves a purpose, yes.</p>

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<p style="text-align: right;">Page 346</p> <p>1 Q. More than serves a purpose. I mean, the</p> <p>2 override form is can this store exceed the ceiling</p> <p>3 limits that we've placed on it and that's -- this</p> <p>4 is a representation of Walgreens Pharmaceutical</p> <p>5 Integrity talking to the store, correct?</p> <p>6 A. As well as their supervisor.</p> <p>7 Q. Yes, sir.</p> <p>8 A. That's why you have column Q with the</p> <p>9 sort of the request description, right? The stores</p> <p>10 don't necessarily get to request directly. It's</p> <p>11 the supervisor of that store that has to initiate</p> <p>12 the request.</p> <p>13 Q. All right. So, maybe J and K match up.</p> <p>14 So, J and K correlate. So, and I missed that</p> <p>15 earlier.</p> <p>16 Request reason code 22, emergency</p> <p>17 situation, emergency situation, right?</p> <p>18 A. That could be.</p> <p>19 Q. So, emergency situation, and that could</p> <p>20 be just about anything I would think, right? That</p> <p>21 doesn't really give you a lot of information,</p> <p>22 emergency situation, does it?</p> <p>23 A. I'm sure it's a drop-down selection they</p> <p>24 have.</p>	<p style="text-align: right;">Page 348</p> <p>1 A. Correct.</p> <p>2 Q. What's that mean?</p> <p>3 A. That would be their schedule.</p> <p>4 Q. Okay. P, "Request Status Code."</p> <p>5 A. I don't know. My -- I don't want to</p> <p>6 guess. I don't know what it means.</p> <p>7 Q. Okay. And then "Request Status</p> <p>8 Description," and you can see here which ones were</p> <p>9 approved and they say "DM approved," "Rx approved,"</p> <p>10 "DM approved," right?</p> <p>11 A. Yes.</p> <p>12 Q. And DM is the divisional manager?</p> <p>13 A. District manager.</p> <p>14 Q. District manager. And I'm a little</p> <p>15 confused. I thought they were getting approved by</p> <p>16 Pharmaceutical Integrity?</p> <p>17 A. They are, but -- so, the process, we</p> <p>18 don't let the stores just make the call. They have</p> <p>19 to talk to their leadership over them in the area</p> <p>20 and say I need a request to exceed my ceiling for</p> <p>21 these -- this product. The DM has to go in and</p> <p>22 make that request to us.</p> <p>23 So, there is -- it's another -- it's</p> <p>24 another level, layer of approval process.</p>
<p style="text-align: right;">Page 347</p> <p>1 Q. Okay. And then L, "Pack Size." What's</p> <p>2 that mean?</p> <p>3 MR. STOFFELMAYR: Where do you see that?</p> <p>4 MR. MOUGEY: L, after K. K, L.</p> <p>5 MR. STOFFELMAYR: I'm sorry. Column L.</p> <p>6 BY MR. MOUGEY:</p> <p>7 Q. "Pack Size."</p> <p>8 A. The unit size. Appears to be the unit</p> <p>9 size.</p> <p>10 Q. And M, "UOM"?</p> <p>11 A. I don't know what that -- I don't know</p> <p>12 what that stands for.</p> <p>13 Q. Unit order monitoring?</p> <p>14 A. I don't --</p> <p>15 Q. You don't know?</p> <p>16 A. I have no idea.</p> <p>17 Q. Next one, "DC Number"?</p> <p>18 A. Um-hmm.</p> <p>19 Q. What's that?</p> <p>20 A. That would be distribution center that</p> <p>21 they're serviced out of.</p> <p>22 Q. Okay. And then --</p> <p>23 A. Is my understanding.</p> <p>24 Q. O, "Control Drug Class"?</p>	<p style="text-align: right;">Page 349</p> <p>1 Q. So, it goes through the DM first and</p> <p>2 then it goes through Pharmaceutical Integrity?</p> <p>3 A. Correct.</p> <p>4 Q. And then the request --</p> <p>5 A. I believe they actually, the way it</p> <p>6 works, is the store submits the request. It goes</p> <p>7 to the DM. They have to approve it. They can</p> <p>8 approve it or decline it. If it declines, it just</p> <p>9 goes back to the store. If they approve it, then</p> <p>10 it routes to Pharmaceutical Integrity for review.</p> <p>11 Q. Okay. And "Request Status Role" and</p> <p>12 then obviously we went through the "Request Status</p> <p>13 Comments," U, at the end, right?</p> <p>14 A. Correct.</p> <p>15 Q. Now, I could be mistaken, but I believe</p> <p>16 that the earliest entry we have been able to find</p> <p>17 on any override form is September 13. Okay. So,</p> <p>18 I'm looking at column B. I'm not asking you to...</p> <p>19 But do you have any understanding of</p> <p>20 when these override forms or anything similar to</p> <p>21 this documenting the reasons why the ceilings were</p> <p>22 allowed to be overridden were captured prior to</p> <p>23 Pharmaceutical Integrity?</p> <p>24 A. I don't, no.</p>

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<p style="text-align: right;">Page 350</p> <p>1 Q. You don't know or you didn't ask?</p> <p>2 A. I don't know. I don't know where they</p> <p>3 would have been documented.</p> <p>4 Q. Was your charge to come in just to start</p> <p>5 a whole new operation?</p> <p>6 A. Yes.</p> <p>7 Q. I don't want anyone to look in the</p> <p>8 rearview mirror. Start from scratch?</p> <p>9 MR. STOFFELMAYR: Objection to the form.</p> <p>10 BY THE WITNESS:</p> <p>11 A. That wasn't how it was described to me.</p> <p>12 It was described --</p> <p>13 BY MR. MOUGEY:</p> <p>14 Q. How was it described? You went to</p> <p>15 Villanova undergrad?</p> <p>16 A. No.</p> <p>17 Q. Where did you go?</p> <p>18 A. I did not. I took executive --</p> <p>19 Q. New Mexico?</p> <p>20 A. Correct.</p> <p>21 Q. So, you come in in '12. Walgreens has</p> <p>22 several thousand stores at that point, right?</p> <p>23 A. Yeah.</p> <p>24 Q. It has hundreds of thousands of</p>	<p style="text-align: right;">Page 352</p> <p>1 A. Yes.</p> <p>2 Q. And I think it would be fair to say that</p> <p>3 there was some significant sense of urgency when</p> <p>4 you took over with Pharmaceutical Integrity. Is</p> <p>5 that fair?</p> <p>6 A. That's fair.</p> <p>7 Q. And as you became educated about what</p> <p>8 was going on nationally, did you come to understand</p> <p>9 the significance of the opiate epidemic across the</p> <p>10 country?</p> <p>11 A. Yes.</p> <p>12 Q. And you could see that year after year</p> <p>13 after year for at least a decade that deaths had</p> <p>14 been increasing, correct?</p> <p>15 MR. STOFFELMAYR: Objection to the form.</p> <p>16 BY THE WITNESS:</p> <p>17 A. Yes.</p> <p>18 BY MR. MOUGEY:</p> <p>19 Q. And you were being educated internally</p> <p>20 through PowerPoints and whatever else from your --</p> <p>21 from Walgreens that opiate overdoses had overtaken</p> <p>22 even motor vehicle accidents as a leading cause of</p> <p>23 death, correct?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 351</p> <p>1 employees, correct?</p> <p>2 A. Um-hmm.</p> <p>3 Q. It had been distributing controlled</p> <p>4 substances through distribution centers for a long</p> <p>5 period of time, correct?</p> <p>6 A. Yes.</p> <p>7 Q. It was in the middle of a significant</p> <p>8 investigation by the DEA, correct?</p> <p>9 A. Yes.</p> <p>10 Q. As a matter of fact, it looked like the</p> <p>11 case may actually get tried about the same time</p> <p>12 that Pharmaceutical Integrity was being created,</p> <p>13 correct?</p> <p>14 A. Yes.</p> <p>15 Q. There was preparation for an actual</p> <p>16 administrative proceeding with the DEA, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And you personally were preparing as a</p> <p>19 possible witness in that case, were you not?</p> <p>20 A. I was.</p> <p>21 Q. And, so, you were intimately aware of</p> <p>22 the pressure Walgreens was under in '12 and early</p> <p>23 '13 with what you referred to earlier as gaps in</p> <p>24 its system, correct?</p>	<p style="text-align: right;">Page 353</p> <p>1 Q. And do you know anyone, just socially,</p> <p>2 kids, family, that you know throughout your network</p> <p>3 socially of people who have been impacted by the</p> <p>4 opiate crisis?</p> <p>5 A. Yes.</p> <p>6 Q. And do you have -- I'm not -- don't</p> <p>7 tell -- I'm not asking names or anything else.</p> <p>8 But do you have people that you know or</p> <p>9 your kids know or spouse knows that had problems</p> <p>10 with opiate abuse?</p> <p>11 A. Yes.</p> <p>12 Q. Do you know specifically people -- I'm</p> <p>13 not asking names -- but that had overdosed?</p> <p>14 A. Yes.</p> <p>15 Q. Do you or your kids or your social</p> <p>16 network know people who had overdosed?</p> <p>17 A. Yes.</p> <p>18 Q. Do you know people who had died?</p> <p>19 A. Yes.</p> <p>20 Q. So, you understood when you took over in</p> <p>21 Pharmaceutical Integrity the significance of the</p> <p>22 national crisis and the import of the task at hand?</p> <p>23 A. I certainly was educated, yes.</p> <p>24 Q. Did it give you pause for concern about</p>

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<p style="text-align: right;">Page 354</p> <p>1 the gaps that Walgreens had in its suspicious order</p> <p>2 monitoring system on the distributor side when you</p> <p>3 took over?</p> <p>4 A. Certainly I wanted -- my job as I saw it</p> <p>5 was to improve the process and close whatever gaps</p> <p>6 that may exist to make it a more -- more robust</p> <p>7 process.</p> <p>8 Q. Did any of your team members have -- and</p> <p>9 I'm saying team in the Pharmaceutical Integrity</p> <p>10 Department. I realize you had more areas under</p> <p>11 your auspices than that.</p> <p>12 But did any of the team members in</p> <p>13 Pharmaceutical Integrity have backgrounds in</p> <p>14 compliance?</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. It was a combination of people that had</p> <p>17 pharmaceutical backgrounds, technical backgrounds</p> <p>18 and some loss prevention. Is that fair?</p> <p>19 A. Pharmacy backgrounds, what I would call</p> <p>20 people that were strong with data and analytics and</p> <p>21 loss prevention. That would generally surmise who</p> <p>22 they were.</p> <p>23 Q. So -- this is my word. You tell me if</p> <p>24 it's wrong.</p>	<p style="text-align: right;">Page 356</p> <p>1 Q. And there was -- I forget the exact</p> <p>2 title, but there were also four spots in the org</p> <p>3 chart underneath the business analysts initially</p> <p>4 that weren't filled, is that?</p> <p>5 A. There was -- we did a high-level sketch</p> <p>6 when we first started out as what we thought it</p> <p>7 might look like, yes.</p> <p>8 Q. So, Tasha, four business analysts and</p> <p>9 four managers, so approximately eight people, give</p> <p>10 or take. Does that sound about right?</p> <p>11 A. Yeah.</p> <p>12 Q. Made a fairly significant dent in a</p> <p>13 matter of months on the amount of scheduled</p> <p>14 narcotics, opiates that went from Walgreens across</p> <p>15 the country. Fair?</p> <p>16 A. Well, I think we certainly stood up a</p> <p>17 number of policies and processes and tools that</p> <p>18 impacted the dispensing of opioids across the</p> <p>19 country, yes.</p> <p>20 Q. And that was just in a matter of months?</p> <p>21 A. Six, eight months, nine months,</p> <p>22 something like that.</p> <p>23 Q. Did you ever get to the point where you</p> <p>24 were, after you saw what the impact in the opiate</p>
<p style="text-align: right;">Page 355</p> <p>1 You and Tasha Polster assembled a SWAT</p> <p>2 team, so to speak, of some different areas of</p> <p>3 specialty. Is that fair?</p> <p>4 A. Well, we certainly hoped to get the</p> <p>5 right talent in the right place.</p> <p>6 Q. Okay. And you selected Tasha Polster,</p> <p>7 an administrative assistant, correct?</p> <p>8 Tasha Polster and an administrative</p> <p>9 assistant was part of the team, right?</p> <p>10 A. I'm not following you.</p> <p>11 Q. I'm going to walk through them. I am</p> <p>12 looking through the org chart in my head. Bear</p> <p>13 with me.</p> <p>14 You have got Tasha Polster, right?</p> <p>15 A. Um-hmm.</p> <p>16 Q. You have four managers underneath Tasha,</p> <p>17 correct?</p> <p>18 A. Correct.</p> <p>19 Q. And they were each in charge of</p> <p>20 geographic locations, correct?</p> <p>21 A. That's correct.</p> <p>22 Q. Underneath one of them is a business</p> <p>23 analyst, correct?</p> <p>24 A. Correct.</p>	<p style="text-align: right;">Page 357</p> <p>1 crisis was across the country as you were being</p> <p>2 educated starting Pharmaceutical Integrity, get to</p> <p>3 the point where you were frustrated or upset with</p> <p>4 how did this happen in the company that I had spent</p> <p>5 32 years with and how did it get this bad?</p> <p>6 MR. STOFFELMAYR: Objection to the form. Go</p> <p>7 ahead.</p> <p>8 BY THE WITNESS:</p> <p>9 A. I think there were a number of</p> <p>10 frustrations not only with, you know -- just in</p> <p>11 general it's a very complex issue, as I'm sure</p> <p>12 you're aware. And as I came up to speed on what it</p> <p>13 was, I would say that I was frustrated in many ways</p> <p>14 with what was going on.</p> <p>15 I was frustrated with the DEA's</p> <p>16 interaction with us. I was frustrated with what</p> <p>17 some pharmacists would do on this. I was</p> <p>18 frustrated with -- there was -- it's a -- it's a</p> <p>19 significant issue.</p> <p>20 Q. And Walgreens tapped you and your</p> <p>21 experience after whatever that point in time was,</p> <p>22 20 plus years at Walgreens, I need you to assemble</p> <p>23 a team and I need you to come in and help fix that,</p> <p>24 and did you ever get to the point where you, "Why</p>

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<p style="text-align: right;">Page 358</p> <p>1 in the world did Walgreens not do this ten years 2 ago?" 3 MR. STOFFELMAYR: Objection to the form. 4 BY THE WITNESS: 5 A. I wouldn't say I got to that point. 6 BY MR. MOUGEY: 7 Q. There was nothing stopping Walgreens 8 from doing what Rex Swords and Tasha Polster did in 9 2013 from doing that at the very beginning of the 10 opiate crisis ten years earlier, correct? 11 MR. STOFFELMAYR: Objection to the form. 12 BY MR. MOUGEY: 13 Q. There was nothing stopping Walgreen from 14 doing what you did 10, 11, 12, 13 years earlier, 15 correct? 16 MR. STOFFELMAYR: Objection to the form. 17 BY THE WITNESS: 18 A. No. 19 BY MR. MOUGEY: 20 Q. It was a culture issue at Walgreens that 21 said, in response to DEA investigations, in 22 response to a case about to get tried, that 23 Walgreens assembled you and asked you to put 24 together a team to close the gaps, correct?</p>	<p style="text-align: right;">Page 360</p> <p>1 procedures? 2 A. Again, I think -- 3 MR. STOFFELMAYR: Objection to the form. Go 4 ahead. 5 THE WITNESS: I'm sorry. 6 BY THE WITNESS: 7 A. Again, I think it was an awareness. 8 This was an issue of national proportion and what 9 happened in Florida really sort of caught people 10 off guard, and we did our best at that time as a 11 company to react to it as quickly as we could. 12 BY MR. MOUGEY: 13 Q. When you say it took Walgreens off 14 guard, I asked you earlier about your awareness of 15 Congressional hearings that began in late '90s, 16 early 2000s. Don't you think somebody at Walgreens 17 should have been aware of Congressional 18 investigations that occurred 12, 13 years prior to 19 you coming on board? 20 A. I don't -- I don't have an opinion on 21 that. It's -- I don't know what -- what they 22 should or shouldn't have done or what we do as far 23 as monitoring Congressional investigations. 24 Q. Do you have a -- Walgreens pays for a</p>
<p style="text-align: right;">Page 359</p> <p>1 MR. STOFFELMAYR: Objection to the form. Go 2 ahead. 3 BY THE WITNESS: 4 A. I wouldn't characterize it as a culture 5 issue. I would characterize it more as an 6 awareness issue. 7 BY MR. MOUGEY: 8 Q. And Walgreens throughout the 2000s 9 profited from a dramatically increasing opiate 10 business at its pharmacies around the country and 11 the profits from the controlled substances it sold 12 went to its bottom lines -- bottom line and didn't 13 take any steps until as dramatic as was taken in 14 2013 to close the gaps, correct? 15 MR. STOFFELMAYR: Objection to the form. 16 BY THE WITNESS: 17 A. Well, I'm not sure I -- it sounded like 18 a statement, not a question to me. Is there -- is 19 there a question? 20 BY MR. MOUGEY: 21 Q. Yes. What took Walgreens until 2013 to 22 put together eight people out of hundreds of 23 thousands of employees to close the gaps on its 24 suspicious order monitoring policies and</p>	<p style="text-align: right;">Page 361</p> <p>1 team of lobbyists, does it not? 2 A. We do have lobbyists, yes. 3 Q. Yes, sir. And you would think that 4 anybody with their ear to the ground in DC would 5 know that there was a raging opiate epidemic 6 roaring through the 2000s, would you not? 7 MR. STOFFELMAYR: Objection to the form. 8 BY THE WITNESS: 9 A. I think, you know, lobbyists do what 10 lobbyists do. I'm not a lobbyist. I don't know. 11 BY MR. MOUGEY: 12 Q. Walgreens. You would think Walgreens 13 with its hundreds of thousands of employees and 14 several thousand stores would have an awareness of 15 a raging opiate epidemic through the 2000s and have 16 taken action prior to 2013, would you not? 17 MR. STOFFELMAYR: Objection to the form. 18 BY THE WITNESS: 19 A. Again, I don't have an opinion on it. 20 MR. MOUGEY: Kaspar, if I could take -- let me 21 take five minutes. I have got a couple docs. I 22 want to organize them. My goal is to try to be 23 done in the next 45 minutes. Does that work for 24 the cat?</p>

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1 MR. STOFFELMAYR: Yes.
2 MR. MOUGEY: Okay.
3 THE VIDEOGRAPHER: We are going off the record
4 at 3:10 p m.
5 (WHEREUPON, a recess was had
6 from 3:10 to 3:39 p m.)
7 THE VIDEOGRAPHER: We are back on the record
8 at 3:39 p m.
9 BY MR. MOUGEY:
10 Q. We talked about 340B just for a few
11 minutes earlier. 340B. When did Walgreens -- let
12 me use the word "participating." I don't know if
13 that's the right word.
14 But when did Walgreens participate in
15 the distribution of Schedule II/Schedule III
16 opiates in 340B?
17 A. I don't know the dates. I don't know
18 the dates on. We have participated broadly in 340B
19 for years. I'm not sure.
20 Q. You don't remember?
21 A. I'm not involved in 340B, so I don't
22 know the dates.
23 Q. Who would -- what part of the
24 organizational structure at Walgreens would you

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1 consider to be the -- would know about the 340B
2 program?
3 A. There is actually a 340B team.
4 Q. Is there?
5 A. Yes.
6 Q. Do you know who's on it?
7 A. Carl Meehan is the senior director for
8 340B.
9 Q. Carl Meehan. And who else is on the
10 team?
11 A. I don't know the rest of them. I know
12 the leader.
13 Q. You know Carl?
14 A. I know, yeah, I know Carl.
15 Q. So, it's a big enough business segment
16 that there's at least a team that's designed to
17 manage that process?
18 A. Yes.
19 MR. MOUGEY: I don't have any further
20 questions.
21 MR. STOFFELMAYR: If you don't mind, when you
22 are answering, just --
23 THE WITNESS: Look at the camera.
24 MR. STOFFELMAYR: Don't look at me because it

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